

October 28, 1997

**MEMORANDUM TO:** Distribution

**FROM:** Michael J. Rubino, Associate Director  
Acquisition Services Branch

**SUBJECT:** Policy Memorandum 97-016, Establishment of Corporate  
Accounts at Insured Depository Institutions

1. Purpose. The purpose of Policy Memorandum No. 97-016 is to clarify the application of the Acquisition Policy Manual (APM) for establishing accounts on behalf of the FDIC at insured depository institutions.
2. Reference.
  - a. APM 1.A.1.a *Authority*, page 1-1
  - b. APM 1.A.1.e *Exclusions*, page 1-3
3. Scope. This policy Memorandum is applicable to all Contracting Officers and Acquisition Services Branch (ASB) personnel involved in developing and issuing solicitations and awarding contracts.
4. Background. The Chief Financial Officer (CFO) has the delegated authority to, among other things, establish and maintain accounts at insured depository institutions (i.e., commercial banks, savings and loans and credit unions). This authority may be redelegated. These accounts are a service provided by these institutions for their customers and are essentially contracts between the institution and the depositor. However, unlike other contracts for services, including contracts for services required by the Division of Finance (DOF), there is no requirement that accounts at insured depository institutions be established following the policies and procedures stated in the APM. However, DOF may, in its sole discretion, elect to follow the APM and submit these requirements to the Acquisition Services Branch for processing.
5. APM Change. Therefore, this Policy Memorandum revises the APM as follows:
  - a. APM 1.A.1.e., *Exclusions*, is amended by the addition of a new subparagraph (4), as follows:

1.A.1.e. (4) ***Accounts at Insured Depository Institutions.*** The Chief Financial Officer (CFO) or designee may establish and maintain accounts at insured depository institutions on behalf of FDIC in either its corporate, receivership or conservatorship capacity without following the policies and procedures stated in

the APM. This includes the authority to establish certain terms of the accounts such as the designation of signatories and the authorization of monthly statements as well as the authority to acquire ancillary services for these accounts relating to processing receipts and disbursements and the purchase and sale of allowable investments. Notwithstanding the forgoing, DOF may, in its sole discretion, elect to follow the APM and submit these requirements to the Acquisition Services Branch for processing.

6. Effective Date. This Policy Memorandum is effective immediately.

7. Contacts. If you have any questions regarding this Policy Memorandum, please call David McDermott on (202) 942-3434.

cc: Jane Sartori  
John Lynn  
DOA Regional Managers  
DOA Associate Directors  
Paul Sachtleben  
Louis Wright  
William Collishaw  
Erica Cooper

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